

MEF Expert Designation and Report - CONTAINS ATTORNEY'S EYES ONLY MATERIAL

Briscoe, Adam <ABriscoe@wiley.law>

Thu 9/23/2021 10:47 PM

To: Seth Carson <seth@dereksmithlaw.com>

Cc: Barnes III, Attison <ABarnes@wiley.law>; Sidney Gold <sgold@discrimlaw.net>; Bill Rieser <brieser@discrimlaw.net>

ATTACHMENT CONTAINS ATTORNEY'S EYES ONLY MATERIAL PURSUANT TO TERMS OF PROTECTIVE ORDER

Seth,

Pursuant to Fed. R. Civ. P. 26(a)(2) and the Court's Scheduling Order (Dkt. No. 101), attached is Plaintiff's expert designation and report. Please note that this report in its entirety has been designated as "Attorney's Eyes Only" pursuant to the terms of the protective order.

Best,
Adam



Adam R. Briscoe
Attorney at Law
abriscoe@wiley.law

Wiley Rein LLP • 1776 K Street NW • Washington, DC 20006

o: 202.719.4570

[Download V-Card](#) | wiley.law | [Bio](#)

NOTICE: This message (including any attachments) from Wiley Rein LLP may constitute an attorney-client communication and may contain information that is PRIVILEGED and CONFIDENTIAL and/or ATTORNEY WORK PRODUCT. If you are not an intended recipient, you are hereby notified that any dissemination of this message is strictly prohibited. If you have received this message in error, please do not read, copy or forward this message. Please permanently delete all copies and any attachments and notify the sender immediately by sending an e-mail to Information@wiley.law

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

THE MIDDLE EAST FORUM,	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
LISA REYNOLDS-BARBOUNIS,	:	Civil Action No.: 19-5697
	:	
Defendant.	:	
	:	

PLAINTIFF’S RULE 26(A)(2) DISCLOSURE

Plaintiff The Middle East Forum (“MEF” or “Plaintiff”), by counsel and pursuant to Fed. R. Civ. P. 26(a)(2) and this Court’s Scheduling Order, submits this Rule 26(a)(2) Disclosure.

Expert Designations

1. Stephen A. Holzen, Managing Director at Stout Risius Ross, LLC, 1015 15th Street NW, Suite 1050, Washington, D.C., 20005, is an expert in the fields of economic and intellectual property damages. Mr. Holzen is expected to testify regarding damages due to MEF for various contractual breaches, misappropriation of trade secrets, and other alleged actions of Defendant Lisa Reynolds-Barbounis. Mr. Holzen’s *curriculum vitae* as well as his specific opinions and the basis for those opinions are set forth in the Report of Stephen A. Holzen, attached hereto as Exhibit “1.” Mr. Holzen charges \$475.00 an hour for his services.

2. Plaintiff also reserves the right to elicit expert testimony from Jamente Cooper, who, on behalf of Contact Discovery Services, LLC, conducted a system reset analysis of a laptop that Defendant used while employed by Plaintiff. The investigation was conducted by Ms. Cooper

in August 2020. Ms. Cooper is expected to opine that a factory reset was performed on Defendant's laptop on or about August 8, 2019 and that no log files dated prior to August 8, 2019 are present on the laptop. To the extent that Ms. Cooper is called to provide expert testimony, it is based on her years of experience in the industry and her knowledge of forensic computer analysis.

3. Plaintiff reserves the right to call any experts properly identified by the Defendant and not objected to by Plaintiff.

4. Plaintiff also reserves the right to supplement this designation with additional designations of experts as permitted by the Court, by subsequent court order, by agreement of the parties, or pursuant to the Federal Rules of Civil Procedure.

Dated: September 23, 2021

THE MIDDLE EAST FORUM
By counsel

s/ Sidney L. Gold
Sidney L. Gold
sgold@discrimlaw.net
Sidney L. Gold & Associates P.C.
1835 Market Street, Suite 515
Philadelphia, PA 19103
Tel: (215) 569-1999
Fax: (215) 569-3870

Attison L. Barnes, III
abarnes@wiley.law
1776 K Street NW
Washington, DC 20006
Tel: (202) 719-7000
Fax: (202) 719-7049

Counsel for The Middle East Forum

CERTIFICATE OF SERVICE

I hereby certify that, on September 23, 2021, I caused the foregoing to be electronically mailed with a copy sent first class mail, postage prepaid to the following counsel:

Seth D. Carson, Esquire
Derek Smith Law Group, PLLC
1835 Market Street
Suite 2950
Philadelphia, PA 19103
Telephone: (267) 857-0864
Email: seth@dereksmithlaw.com

s/ Sidney L. Gold
Sidney L. Gold
sgold@discrimlaw.net
Sidney L. Gold & Associates P.C.
1835 Market Street, Suite 515
Philadelphia, PA 19103
Tel: (215) 569-1999
Fax: (215) 569-3870

Attison L. Barnes III
abarnes@wiley.law
Wiley Rein LLP
1776 K Street NW
Washington, DC 20006
Tel: (202) 719-7000
Fax: (202) 719-7049

Counsel for The Middle East Forum